

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREW R. PERRONG
1657 THE FAIRWAY #131
JENKINTOWN, PA 19046

Plaintiff

vs.

CHARLIE FOR GOVERNOR, CHARLES
GEROW, AND MARGUERITE LUKSIK

Defendants.

Case No. 2:22-cv-04013

JURY TRIAL DEMANDED

DEFENDANT'S MOTION IN LIMINE

COMES NOW, Defendant Charles Gerow, pro se, and respectfully files this Motion in Limine seeking to preclude Plaintiff from attempting to introduce evidence or testimony alleging any controlling relationship between individual Defendant Gerow and Defendant Charlie for Governor, a now defunct committee, and sets forth the following in support thereof:

- 1) Plaintiff has only made the facial assertion that Defendant Gerow "organized and orchestrated" calls of which he complains. He has offered no other evidence of this claim.
- 2) Plaintiff relies on the alleged fact that Defendant's voice was made a part of the call(s) complained of as evidence of Defendant's organizing and orchestrating said calls. This novel theory is unsubstantiated by anything other than Plaintiff's conjecture and repeated assertions.
- 3) There is no evidence supporting any assertion that Defendant Gerow orchestrated or directed any of the complained of calls and any attempt to confuse this case by suggesting so is far more potentially prejudicial than any alleged probative value.

- 4) Likewise, Plaintiff's attempts to perfect service on Defendant Charlie for Governor by and through Defendant Gerow are misplaced and contrary to the Federal Rules of Civil Procedure.
- 5) Defendant Gerow respectfully requests that this Honorable Court Order Plaintiff not to mention, refer to, or attempt to elicit in any manner at trial any testimony inferring or suggesting that Defendant Gerow controlled or is otherwise responsible for the alleged acts or conduct of Defendant Charlie for Governor.

Respectfully submitted,

Dated: February 21, 2024

/s/ Charles R. Gerow

Charles R. Gerow
4725 Charles Road
Mechanicsburg, PA 17050
717-877-8194
Cgerow@quantumcomms.com

CERTIFICATE OF SERVICE

I certify that I caused the above Motion in Limine to be served on Plaintiff by

United States Mail, first class postage prepaid, on February 21, 2024 at the following

address: Andrew Perrong
1657 The Fairway #131
Jenkintown, PA 19046.

BY: /s/ Charles R. Gerow
CHARLES R. GEROW
4725 Charles Rd.
Mechanicsburg, PA 17050